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Attorneys for Defendant Wachovia Mortgage,  
FSB, f/k/a and sued as "World Savings Bank,  
FSB"

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

DOLORES MANDRIGUES, individually and on behalf of all others similarly situated,

Case No. C07-04497 JF (RS)

Plaintiff,

VS.

WORLD SAVINGS, INC., WORLD SAVINGS BANK, FSB, WACHOVIA MORTGAGE CORPORATION, and DOES 1 through 10, inclusive.

## Defendants.

**DECLARATION OF KEITH D. YANDELL  
IN SUPPORT OF DEFENDANTS'  
ADMINISTRATIVE MOTION TO FILE  
THE DECLARATION OF LISA BEENS IN  
OPPOSITION TO PLAINTIFFS' MOTION  
TO COMPEL NAMES, ADDRESSES AND  
TELEPHONE NUMBERS UNDER SEAL**

Date: June 18, 2008  
Time: 9:30 a.m.  
Place: Courtroom 4

Compl. Filed: August 30, 2007

## The Honorable Richard Seeborg

1. I am an associate at the law firm of Reed Smith, LLP, counsel for Defendants in the  
2 above entitled action. I am a member in good standing of the State Bar of California. I submit this  
3 declaration in support of Defendants' Administrative Motion to File the Declaration of Lisa Beens In  
4 Opposition to Plaintiffs' Motion to Compel Names, Addresses and Telephone Numbers Under Seal.  
5 I have personal knowledge of the matters set forth herein, and could and would competently testify  
6 to them if called to do so.

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8. Defendants seek to file the Declaration of Lisa Beens under seal pursuant to Local  
9 Rule 79-5(b). The entire Declaration contains "CONFIDENTIAL PRIVATE CONSUMER  
10 INFORMATION" as that term is defined in the Court's Stipulated Protective Order signed on May  
11 7, 2008 and, therefore, all of the Declaration is sealable under Local Rule 79-5 and the Stipulated  
12 Protective Order entered by this Court. Specifically, the Declaration describes, in detail, private  
13 financial information of Mark and Christina Clauson, two of the named Plaintiffs in this matter.

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15 I declare under the penalty of perjury under the laws of the United States of America that the  
16 foregoing is true and correct.

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DATED: May 28, 2008

19 /s/ Keith D. Yandell

20 Keith D. Yandell

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